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From: Mike Coghlan [mpcoghlan@sabrecom.com]
Sent: Tuesday, August 04, 2009 3:32 PM
To: OSHSB
Subject: OSHA Telecommunications Ladders 1910.268(h)

August 4, 2009

Occupational Safety & Health Standards Board
2520 Venture Oaks Way, Suite 350
Sacramento, California 95833

RE: OSHA Telecommunications Ladders 1910.268(h)

Sabre Towers and Poles, a global manufacturer of communication structures, is requesting additional text specific to telecommunication tower ladders be added to the CALOSHA standard for consistency with federal standards and existing field applications. We believe there are thousands of telecommunication towers in use in the state of California that comply with federal standards but do not comply with current California standards.

The addition of the language below currently found in OSHA Telecommunications standard 1910.268 will correct this inconsistency:

"The spacing between steps or rungs permanently installed on poles and towers shall be no more than 18". This requirement also applies to fixed ladders on towers, when so equipped. Spacing between steps shall be uniform above the initial unstepped section, except where working, standing, or access steps are required. Fixed ladder rungs and step rungs for poles and towers shall have a minimum diameter of 5/8". Fixed ladder rungs shall have a minimum clear width of 12 inches. Steps for poles and towers shall have a minimum clear width of 4 1/2". The spacing between detachable steps may not exceed 30 inches on any one side, and these steps shall be properly secured when in use".

Thank you in advance for your careful consideration of this request.

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